

FILED

2010 MAR 15 P 3:35

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF N CALIFORNIA

CV 10 617 SC

DIGBY ADLER GROUP LLC

v.

IMAGE RENT A CAR INC AND VAN RENTAL CO INC  
Defendants.

✓ MOTION FOR ENLARGEMENT OF TIME

IN WHICH TO FILE RESPONSIVE PLEADINGS OR ANSWER

DEFENDANTS MOVE THIS COURT FOR AN ENLARGEMENT OF 60 DAYS IN  
WHICH TO FILE ANSWERS OR OTHER RESPONSIVE

PLEADINGS AND AS GROUNDS THEREFORE STATE AS FOLLOWS;

DEFENDANTS ARE BOTH NEW YORK CORPORATIONS WITH NO TIES TO OR  
BUSINESS PRESENCE IN CALIFORNIA.

THIS CASE PRESENTS COMPLICATED ISSUES OF TRADEMARK LAW, AND IT IS  
VERY DIFFICULT FOR DEFENDANTS

TO LOCATE, INTERVIEW AND FIND APPROPRIATE COUNSEL FROM NEW  
YORK TO REPRESENT THEM .

ACCORDINGLY, DEFENDANTS NEED THE ENLARGEMENT OF TIME TO HIRE  
SUITABLE COUNSEL WHO ARE ALSO ADMITTED TO

PRACTICE BEFORE THIS COURT

WHEREFORE DEFENDANTS MOVE FOR THE ENLARGEMENT OF TIME TO FILE  
ANSWER OR RESPONSIVE PLEADINGS.

RESPECTFULLY SUBMITTED.

M. Epstein

M EPSTEIN

VP

VAN RENTAL INC



IMAGE RENT A CAR INC

S ZILBERMAN

PRES

7193639505

CERTIFICATE OF SERVICE

I hereby certify that on this the 28 day of FEB , 2010 , a true and correct copy  
of the foregoing document was served upon all counsel of record at his address of record



S ZILBERMN

May Kent Allen

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Brooklyn, NY (122) X

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U.S. District Court of N. California

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San Francisco, CA 94102

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